

PLAINTIFF'S EXHIBIT 6

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

Janice Hargrove Warren

Plaintiff

v. Case No. 4:19-cv-655-BSM

Charles McNulty, et. al

Defendants

**PLAINTIFF'S FIRST SET OF INTERROGATORIES AND SECOND
REQUEST FOR PRODUCTION OF DOCUMENTS**
**TO DEFENDANTS KEMP, WARD, REMELE, THOMAS, GILLEN, KELLER, AND
MAUNE**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, defendants Kemp, Ward, Remele, Thomas, Gillen, Keller, and Maune are to provide his or her individual Responses to the Interrogatories listed below within 30 days of the service of these Interrogatories upon their legal counsel. Each defendant must provide a separate set of Responses to each Interrogatory with his or her signature at the end of the set of Responses. Each defendant must respond to the Document Production Requests contained among the Interrogatories. These Responses must be ordered and labeled consistent with the numbering of the Request for Document Production. The parties previously agreed that discovery, including Responses to these Interrogatories and Requests for Production, may be served electronically.

INTERROGATORIES

INTERROGATORY NO. 1: Please list your name, address, date of birth, place of birth, and Social Security Number.

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INTERROGATORY NO. 2: Kindly provide all addresses where you have resided over the past ten (10) years.

INTERROGATORY NO. 3: List the names, ages, and addresses of all of your children, if any.

INTERROGATORY NO. 4: State whether you are married and list your marriages by providing the names of your current spouse, former spouses, the dates of your marriages, the method of terminating the marriage, and the present address of each former spouse.

INTERROGATORY NO. 5: Please list all relatives by blood or marriage who are over the age of eighteen (18) and who currently reside in the Eastern District of Arkansas.

INTERROGATORY NO. 6: State your educational background and employment history or provide a copy of your current resume as a Response to Document Production Request number 1.

INTERROGATORY NO. 7: List the dates of each term you were elected to serve on the PCSSD Board of Education.

INTERROGATORY NO. 8: If you have served in any other political or elected Office, list the dates of service and the Office to which you were elected.

INTERROGATORY NO. 9: If you have been arrested, charged, or convicted of a felony or a crime involving moral turpitude, state the date and location of the incident, the result of each arrest, charge or conviction including, if applicable, the name and address of the court and prison term or fine imposed, if any.

INTERROGATORY NO. 10: Please list all lawsuits or administrative proceedings, including without limitation union grievances, workers' compensation, or disability actions, in

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which you were a party. Provide the approximate filing date, the court or tribunal in which the matter was filed. Supply the names of all parties and attorneys, a general summary of the claims involved, and the ultimate disposition of the dispute or claim.

INTERROGATORY NO. 11: Did you receive a Candidate Impression Form for submission to the Ray and Associates consultant after watching the videos of the nine candidates submitted to the PCSSD Board of Education during the 2018 Superintendent search? If so, when did you receive the Candidate Impression Form?

INTERROGATORY NO. 12: Did you receive a Matrix for Reaching Candidate Consensus Form for the nine candidates submitted by Ray & Associates during PCSSD's 2018 Superintendent search? If so, when?

INTERROGATORY NO. 12a: List the documents, materials, videos, or communications you received, from whom, when it was received, and indicate if you reviewed it before the March 27, 2018, Executive Session.

INTERROGATORY NO. 12b: Using Attachment A to this set of Interrogatories, indicate the choices you made *during* the Executive Session on March 27, 2018, to select the finalists for interviews for the position of Superintendent for PCSSD in 2018.

INTERROGATORY NO. 12c: To whom did you surrender possession of your Matrix for Reaching Candidate Consensus Form?

DOCUMENT REQUEST NO. 2: If you took a picture or image of your completed Matrix for Reaching Candidate Consensus Form or made a duplicate, provide a copy of it as your response to the plaintiff's document request number 2.

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INTERROGATORY NO. 12d: Were the eleven (11) published qualifications for the position of Superintendent discussed by the Board on March 27, 2018, before, after, or during the Board's viewing of the nine candidate-videos?

INTERROGATORY NO. 12e: Describe the Board's March 27, 2018, discussion of the eleven (11) published qualifications for the position of Superintendent. Include in your description when the eleven qualifications were discussed, who made comments, the comments you recall, the comments you made, and how the discussion influenced your completion of the Matrix for Reaching Candidate Consensus Form.

INTERROGATORY NO. 12f: Describe the process followed by the Board on March 27, 2018, to view the videos and to reach a decision on three finalists.

INTERROGATORY NO. 12g: Did you choose Dr. Janice Warren as a preference among the nine (9) candidates for an interview? If not, why not?

INTERROGATORY NO. 13: At any time before *or* during the March 27, 2018, Executive Session for selecting the finalists for the position of Superintendent for PCSSD, did you receive email(s), text message(s), note(s), call(s), or other oral, written, or electronic communication(s) asking for your preferences, directing or requesting you to make or agree to any preference or particular choice or choices among the candidates?

INTERROGATORY NO. 13a: If you responded "yes" to Interrogatory number 13, list when you received the communication(s), from whom you received the communication(s), and how you received the communication(s)?

DOCUMENT PRODUCTION REQUEST #3: If you responded "yes" to Interrogatory number 13, provide a copy of the communication(s) you received.

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INTERROGATORY NO. 14: Before the 5:30 p.m. Executive Session on April 3, 2018, did you receive an email(s), text message(s), note(s), or other oral, written, or electronic communication(s) asking or requesting you to state your vote or position on a particular finalist or to make or consider making any particular choice or choices among the finalists?

INTERROGATORY NO. 14a: If yes, list when and from whom you received the communication(s)?

DOCUMENT PRODUCTION REQUEST #4: If you responded "yes" to Interrogatory number 14, provide a copy of the communication(s) you received.

INTERROGATORY NO. 14b: Did you receive a Candidate Impression Form for submission to the Ray and Associates consultant after interviewing Charles McNulty or Erick Pruitt?

Respectively submitted this 20th day of March 2020

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Attorney for Plaintiff

CERTIFICATE OF SERVICE

On March 20, 2020, a copy of the foregoing was served by email on Cody Kees and Jay Bequette, BEQUETTE, BILLINGSLEY & KEEES, P.A. 425 West Capitol Avenue, Suite 3200, Little Rock, AR 72201, ckees@bbpalaw.com and jbequette@bbpalaw.com.

Sarah Howard Jenkins
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